Revised 6/98

CORRES. CONTROL INCOMING LTR NO.

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DUE DATE ACTION



Department of Energy

ROCKY FLATS FIELD OFFICE P.O. BOX 928 GOLDEN, COLORADO 80402-0928

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Mr. Tim Rehder U.S. Environmental Protection Agency, Region VIII Rocky Flats Project Manager 999 18th Street, Suite 500 Denver, Colorado 80202-2466

Dear Mr. Rehder:

The purpose of this correspondence is to inform you that the Operable Unit (OU)1 and OU2 Interim Measures/Interim Remedial Action (IM/IRA) decision document modifications that were initiated last summer have been completed. The administrative transfers included in the modifications will be documented in this letter.

OU2 IM/IRA Modification

On July 11, 1997, the Environmental Protection Agency (EPA) approved a modification to the Final Surface Water Interim Remedial Action Plan Environmental Assessment and Decision Document South Walnut Creek Basin, October 1994 (OU2 IM/IRA). The modification had three primary objectives: to create a stand-alone decision document for the reactive metal treatment system at the Mound Site Plume, to administratively transfer the monitoring obligations for Seeps SW061 and SW132 to the Integrated Monitoring Plan (IMP), and to eliminate OU2 IM/IRA authority over the Consolidated Water Treatment Facility (CWTF) in Building 891.

The first objective was met when the Mound Site Plume Decision Document was approved in September 1997. Installation of the reactive metal treatment system is under way.

The EPA conditioned completion of the second objective upon actual transfer of the Seeps SW061 and SW132 monitoring obligations to the Integrated Monitoring Plan (IMP). Page 2-45 of the Draft IMP is enclosed to document that transfer. The operator of the CWTF has relinquished responsibility for sampling to the Rocky Mountain Remediation Services (RMRS) Surface Water Group.

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Reviewed for Addressee Corres. Control RFP

7/29/98 SK

Ref Ltr. #

DOE ORDER # 5400./

Although the IMP has not been finalized, the Department of Energy (DOE) feels that the administrative transfer is complete. The IMP working groups have assumed responsibility for the monitoring, and, for the first time, the sampling is being conducted as part of the site-wide monitoring program. Consistent with the proposal, completion of the administrative transfers has conveyed authority for decision making regarding the monitoring of Seeps SW061 and SW132 to the IMP.

In satisfaction of the third objective, completion of the administrative transfer terminates the OU2 IM/IRA, severing its authority over the CWTF.

OU1 IM/IRA Modification

30 Jan 19 12 14 16 18

In a letter dated August 27, 1997, the EPA conditionally approved a modification to the Interim Measures/Interim Remedial Action Plan and Decision Document, 881 Hillside Area Operable Unit No. 1, January 1990 (OU1 IM/IRA). The modification had two primary objectives: to create a single, discrete, identifiable regulatory authority to govern operations at the CWTF; and to administratively transfer monitoring obligations for the collection well, the french drain, and the Building 881 footing drain to the IMP.

The EPA requested that the DOE update attachments 1 and 2 to the letter in regard to the proposed modification. Attachment 1, a chart, illustrated the elements of the original OU1 and OU2 IM/IRAs and the strategy for integrating the two modifications. The requested updates have been incorporated, and the revised chart, now entitled "Summary of Modifications to OU1 and OU2 IM/IRAs," is enclosed. Changes to attachment 2 are not required, because it specifically recognizes the modifications to the OU1 CAD/ROD that are currently under development.

The DOE submitted a response to the other comments contained in the August 27, 1997, letter on October 2, 1997, and has modified attachment 2 accordingly. The DOE believes this meets the first objective. To that end, the CWTF is currently being operated in accordance with the Sampling and Analysis Plan and Operational Framework provided in attachment 2.

The administrative transfer of monitoring obligations for the collection well, the french drain, and the Building 881 footing drain to the has also been made. Pages 3-15 and E-1 of the Draft IMP are enclosed as documentation. Again, completion of the administrative transfers has also conveyed authority for all decision-making to the IMP.

The operator of the CWTF has relinquished responsibility for sampling to the RMRS Groundwater Group, and the sampling is being performed on a quarterly basis, consistent with the original OU1 IM/IRA. This will continue until the sample locations are fully evaluated under the IMP.

If you should have any technical questions regarding this submittal, please contact Norma I. Castaneda at (303) 966-4226 or contact me at (303) 966-7252.

Sincerely,

R. R. Sarter

RFCA Project Coordinator

Enclosures

cc w/Encs:

G. Kleeman, EPA

C. Spreng, CDPHE

A. Rampertaap, EM-40, HQ

Administrative Record

cc w/o Encs:

- S. Gunderson, CDPHE
- S. Tarlton, CDPHE
- J. Legare, AMEC, RFFO
- B. April, RLG, RFFO
- R. Tyler, ERWM, RFFO
- N. Castaneda, ERWM, RFFO
- L. Butler, K-H
- D. Shelton, K-H

1) Continue to collect and treat groundwater from Collection Well 2) Present chemical-specific, RFCA-based ARARs in new CWTF SAP. Eliminate constituents never ID'd at RFETs and Rocky and eliminates all OUZ IM/IRA groundwater monitoring obligations. IM/IRA is being changed to reflect CDPHE WWTU Policy. 4) Transfers 881 Footing Drain monitoring obligations to IMP and eliminates all OU1 IM/IRA groundwater monitoring obligations. 1) New document governs reactive metal treatment of Mound Site create CERCLA "Consolidated Water Treatment Facility" at B891 1) Continue to use location and action-specifc ARARs in existing 2) Transfers monitoring obligations for SW061 and SW132 to JMP document entitled "Final Mound Site Plume Decision Document ". Major Modification to OU1 IM/IRA Letter modification to Release water from French Drain to South Interceptor Ditch. waters into B891. Note that waste acceptance "guidance" in IA 3) Continue to rely on IA IM/IRA as authority to bring incidental Major Modification to OU2 IM/IRA New replacement Operable Unit 1:881 Hillside, March, 1997 (to be modified) 3) Eliminates all OU2 IM/IRA authority over CWTF (B891). at CWTF (B891). 2) Monitor Collection Well and French Drain under IMP. 3) Retain French Drain as groundwater barrier. 4) Release water from French Drain to South Internation Summary of Modifications to OU1 and OU2 IM/IRAs Mountain Arsenal constituents. Threw away the OU2 IM/IRA. VOC Plume (SW059). OU 1 CAD/ ROD OU1 IM/IRA. System, CDPHE/EPA letter dated 9/14/95 Consolidate OU1 and **OU2 Treatment** Interim Measures/Interim Remedial Action Plan and Remedial Action Plan/Environmental Assessment Decision Document 881 Hillside Area, Operable Unit No. 1, January 1990, "OU1 IM/IRA" Final Surface Water Interim Measures/Interim and Decision Document South Walnut Creek Basin, October 1994, "OU2 IM/IRA" IHSS 119.1 Collection Well (monitoring only, EPA letter collection, treatment and IHSS 119.1 French Drain (collection, treatment and reatment and monitoring) SW132 (monitoring only, SW061 (monitoring only, OU1 Treatment System OU2 Treatment System etter dated 4/28/94) etter dated 4/28/94) SW059 (collection, 881 Footing Drain dated 9/22/94) monitoring) monitoring)

ORARY

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

INTEGRATED MONITORING PLAN

May 1998

Responsible Organization: Environmental Management & Compliance	Effective Date: May 1998
Periodic review frequency: 1 year from the effective date	Reviewed for Classification/UNCI:
	Ву
	Date

- The specific project plan must specify an adequate monitoring method.
- Acceptable Decision Error Rates for Statistical Sampling Design:
 - The specific project plan must specify the decision criteria. Examples are shown in the decision rule section, above.

Monitoring Requirements:

Monitoring details will be specific to the project. The projected Performance monitoring to take place in FY98 is given in Table 2-9. Analyte suites and sample collection protocols are project-specific and are contained in the individual project plans for automated locations and are contained in the Surface Water Monitoring Technical Design Document which can be obtained from RMRS WM&T personnel. The Performance monitoring for FY99 will depend on Site closure activities and schedules.

Table 2-9
Projected FY98 Performance Monitoring Locations

Location			Supporting
Code	Location Description	Project	Documentation
GS27	Small ditch NW of B884	D&D of B889; Watershed	SW Monitoring
		Improvements evaluation	Technical Design
			Document
GS32	Corrugated metal pipe (1.5')	D&D of B779	SW Monitoring
	north of Solar Ponds in PA		Technical Design
	draining B779 area		Document
GS37	Central Ave. Ditch north of	D&D of B123	SW Monitoring
	B443		Technical Design
			Document
GS39	Corrugated metal pipe (1.0')	ER projects for 903 Pad;	SW Monitoring
`	north of 904 Pad draining	also serves as Source	Technical Design
	903/904 Pads and Contractor	Location monitoring station	Document .
	Yard areas	for GS10 Source Evaluation	
SW061 ²⁰	S. Walnut Creek upstream of	OU2 Closure	OU2 Closure Document
	B995	, , , , , , , , , , , , , , , , , , , ,	
SW132	S. Walnut Creek, outfall of	OU2 Closure	OU2 Closure Document
	culvert draining 700 and 900	}	
	Areas, south of B995		

May 1998

²⁰ The inclusion of SW061 and SW132 monitoring in the IMP completes the OU2 IM/IRA administrative transfer of former OU2 monitoring.

 Boundary Monitoring Wells: Wells used to monitor the quality of groundwater leaving the eastern Site boundary.

In addition to this general groundwater monitoring scheme, specific requirements support regulatory directives. The following special categories are included as groundwater program elements:

- D&D Monitoring Wells: Wells used to monitor releases to groundwater from D&D activities on specific buildings. This requirement is specified in the IM/IRA for the Industrial Area (DOE, 1994a).
- Performance Monitoring Wells: Wells used to monitor the effect of a remedial treatment or source removal action. Performance monitoring of source remediation is specifically required in the RFCA ALF for groundwater. The French Drain Performance Monitoring Wells are included in this category and are specified in the French Drain IM/IRA Plan (DOE, 1992).
- RCRA Compliance Wells: Wells used in upgradient and downgradient monitoring of RCRA interim status units. This requirement is specified under 6 Code of Colorado Regulations (CCR) 1007-3. Wells monitored at the new landfill would be specified under 6 CCR 1007-2. Future retrievable storage facilities would also fall under the RCRA monitoring category.

The ALF also lists specific analytes and the associated action level or standard for groundwater and surface water. Groundwater currently needs to meet water protection standards. For purposes of DQO development, the RFCA requirements for groundwater to support the surface water protection classification, and all DQO decisions will reflect this. Each component of the groundwater program can be considered a decision element, and decision statements have been created for each component.

3.4.2.1 Plume Definition Wells

Problem Statement:

Are contaminants within groundwater plumes increasing in concentration with time or reaching Tier I Action Levels with the potential to impact surface water?

Problem Scope:

Plume definition wells lie within the currently known groundwater contaminant plumes and are located appropriately to monitor groundwater pathways that could affect surface water. Plume definition wells are designated based on knowledge of existing groundwater contaminant plumes and particle flow models that simulate groundwater pathways. It is possible that some plume definition wells have historically exceeded Tier I Action Levels. For these wells, only new exceedances of Tier I Action Levels involving

APPENDIX E-1 PROPOSED MONITORING WELLS

5382	THEONENCY	CLASSIFICATION	N P! IMENDE	-		e
4887	Semiarina	FE	881		FORMATION	
4787	Semiannia	상	881 Hillside	A STATE	₹	Plume Extent south of the agentime.
00797	Semiannual	P.E	881 Hilleide		¥	Plune Extent could be a Plume
11092	Seinianonal	₽M	881 Hillsirte	1		Plume Expert events of the del Miliside Plume
1000	Semannai	ž	BB1 Hillside	H-CA		Performance Montage Hillside Plume
10702	Semiannuai	A.	881 Hilleide	\dagger		Performance Montholing Tor 881 Footing Draint Sump
113602	Semiannual	Μď	881 Hilleide	†		Performance Angularing for INB French Drain
2020	Semiannual	Μď	BB Linite	†	₹ 0	Performance moleculary french Drain
7850	Semiannual	₽d	604 Califold	+	L	Performance monitoring for the French Drain
1000	Semiannual	8	BDISIIIL 100	7	₩ 0	Particular Mohillofing for the French Orain
Service Al	Ouarierly	₹d	BRY LINESIDE	+	L	Plume Definition
L COL WEL	Ouarterly	Md	and United	+		Performance Inc. 100 BBI Hillside Plume
SW13494	Ovarienty	Md	PDISIDE DO	+	¥	Performance Montgoring of groundwater in collection sumo in French Co.
9969	Semiannual	8	BDISIIIU : 00	E.C.	-	Performance Monitoring of groundwater in collection well on 881 Direct
9879	Semiannual	8	200 P80	+		Plime Pollaria Monitoring of groundwater in footing green below the
3087	Semiannual	8	903 P80	4	BDASHU	7
2987	Semiannual	6	800 FBO		8	7-
23186	Semiannual	id	200 rad	-	₹	Plant Perfer in the one of the pathway to Woman Cr. in the one of annyans Pit Plane
23096	Semiannual	1 4	and had		¥	phone Delinition well monitoring pathway to Woman Cr. in the conf.
07391	Semiannual	, Ma	903 Pad		4	On the Extent well monitoring the southward migration of the Co.
00491	Semiannual	6	VO3 Pad		CB) IA	profile extent well monitoring the southern migration of the Burne
02297	Semiannual	180	903 Pad	4	BDICHSC	Director and Monitoring well monitoring effects of remediation downs and Plume
02497	Semiannual	S	6// 50IA	4	¥	The Partie Definition well monitoring the 903 Pad VOC Plans
02397	Semiannual	8	6// 6019	_	¥	DAO most
96627	Serniannual	8	6// 5010	-1	L	Or mountained downgradient of Bidg. 779
47691	Semiammai	æ	0100 886	띮	L	Building paragraph of Bidg. 779
11304	Seminimum	8	Boundary	AFCA, AIP	¥	Boundary Well monitoring potential rad contamination near Rag 125
1000	Somiarmual	8	Boundary	RFCA, AIP	₹	Boundary Well - In the Walnut Cr. Drainage at the Indiana Sheet Boundary
08601	Semiannual	8	Boundary	HFCA AIP	¥	Boundary Well in the time of a lease sacess gate
386	Semiannual	8	Boundary	HFCA AIP	¥	Boundary Wall in Asia and Cr. Drainage at the Indiana Steet Burnton.
P210180	Samiannual	80	Boundary	HFCA, AIP	BDAUHSU	Boundary Wall In small and Double South Basi Corner of the Su
00380	Serniannual	O.	Carbon Ter	HFCA AIP	BOAUHSU	Boundary Well in amail drain age east of the Site at Indiana St.
P200280	Semiannual	8	Carbon Ter	DICA HCHA	¥	Plume Delinition well for the last access gate
12101	Semiannual	8	Carbon Tel	HCHA PTO: HCHA	80	Plume Definition well in the Contamination comming from Carbon Ter Plum.
200	Semiannual	Md	Fact Transport	APCA RCRA	¥	Prime Definition wall in the Carbon Tel Plume
2000	Semiannual	34	Fact Troopt	RFCA	USHUVOB	Parlamente Voltage
	Semiannual	Je Be	Fact Transpar	AFCA	¥	Plume Every multiplied at edge of 13 soil excavation
10000	Semiannual	PE	Fact Tronghos	HFCA	¥	Plume Extent well monitoring the northern migration of the East Transfers Ass. Co.
10070	Semiannual	34	Facilities	RFCA	AL/BD	Phime Execution of the southern migration of the East Trenches of
04501	Semiannual	32	Facility of Tropology	RFCA	AL	Plume Extent was more in a northeast migration of the East Transher of the
04001	Semiannual	36	Fact Tronchos	HFCA	Ą	Plume Extent wall man to the eastward migration of the East Transher of the
0300	Semiannual	PE	Fact Tropologo	HFCA		Plume Extent wall mount in the eastward migration of the East Transper During
1,801	Semiannual	30	East Tranchas	H-CA	¥F.	Plume Extent well mostly in a southward migration of the East Trenches Dum.
3687	Semiannual	P.W.	Easi Trenchae	¥1CA		Plume Definition well modified.
12691	Samanna	ΡM	East Trenches	Y S	BOWHSU	Performance Montanna mail many Trenches Plume
05691	Cominger	P _K	East Trenches	A7.0	\neg	Performance Monitoring well most and effects of remediation downgradient of Treach 7.3
18230	Seminarion31	W.		¥1.010	BDIUSHU	erformance Monitoring and Individual effects of remediation downgradian of Transit
10994	Semiannual	8	East Trenchas	A S		Performance Monttoning well monitoring effects of remediation downgradient of Transit T
7086	Semiamonal	3	IA/Old Landilli	A LE		lune Definition well most of the monitoring effects of remediation downgradient of T.
P416889	Cominger	PE	IAYOld Landill	45 C		Plume Extent IA VOA Plumandia eastward concentration of VOCs from the Fast Teach 11st
789	Sometimes	8	T	ALCA FOR WARD		lume Exical well monitoring to an arrange of the monitoring to a second second for the second
Patising	วยาหลากเลา	2	1	OCO - IM/IHA lor IA	AL	albway in Woman
P714280	Semianhual	F.	Ť	HECA, IM/IRA for IA		lume Definition of 18 April 18 Bidg. 664 along pathway to Women C.
	Semiannual	36	T	HECA. IM/IRA for IA	AL	Plume Extent to modern south of 400 area along pathway to Women C.
				MF CA, IM/IRA for IA	П	Plume Extent to monitor the southern migration of 14 Plume south of Blog. 440
						Secure ingration of fA Plume near Bidg. 950
				- 8		